

Fill in this information to identify the case:

Lisa M Keyser
Debtor(s)

**UNITED STATES BANKRUPTCY COURT FOR THE: WESTERN
DISTRICT OF PENNSYLVANIA**
Chapter 13 Case Number: 13-70218-JAD

FORM 4100R

RESPONSE TO NOTICE OF FINAL CURE PAYMENT

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

PART 1: Mortgage Information

Name of creditor: PENNYMAC CORP

Court claim no. (if known): 4

Last four digits of any number you use to identify the debtor's account: 9520

Property Address: 2608 Graham Avenue, Windber, PA 15963

PART 2: Pre-Petition Default Payments:

Check one:

- ☒ Creditor agrees that Debtor(s) has/have paid in full the amount required to cure the default on Creditor's claim
- ☐ Creditor disagrees that Debtor(s) has/have paid in full the amount required to cure the pre-petition default on Creditor's claim. Creditor asserts that the total amount due to cure the pre-petition amount remaining unpaid is:

Total Amount Due: \$ ____

PART 3: Post-Petition Mortgage Payments

Check One

- ☒ Creditor states that the debtor(s) are current with all post-petition payments consistent with §1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow and costs.
The next post-petition payment from the debtor(s) is due on: 05/01/2018
- ☐ Creditor states that the debtor(s) are **not** current on all post-petition payments consistent with §1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow and costs.
Creditor asserts that the total amount remaining unpaid as of the date of this response is:
- | | |
|--|-------------|
| (a) Total post-petition ongoing payments due: | (a) \$ ____ |
| (b) Total fees, charges, expenses, escrow and costs outstanding: | (b) \$ ____ |
| (c) Total. Add lines a and b. | (c) \$ ____ |

Creditor asserts that the debtor(s) are contractually obligated for the post-petition payment(s) that first became due: _____

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PART 4: Itemized Payment History

If the creditor disagrees in Part 2 that the pre-petition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

PART 5: Sign Here

The person completing this Response must sign it. The response must be filed as a supplement to the creditor's Proof of Claim.

Check the appropriate box.

☐ I am the creditor.

☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.

X /s/ Harry B. Reese, Esquire

Jill Manuel-Coughlin, Esquire
Harry B. Reese, Esquire

Date: 07/03/2018

Title: Attorney

Print: Jill Manuel-Coughlin, Esquire
Harry B. Reese, Esquire

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Case No. 13-70218-JAD
Lisa M Keyser	
Debtor(s)	
PENNYMAC CORP	
Movant	
v.	
Lisa M Keyser	
Debtor(s)	

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Statement in Response to Notice of Final Cure Payment was served on the parties listed below by postage-prepaid U.S. Mail, First Class or served electronically through the Court's ECF System at the e-mail address registered with the Court on July 3, 2018.

Parties Served via Electronic Notification:

Kenneth P. Seitz, Esquire
Law Offices of Kenny P. Seitz
P.O. Box 211
Ligonier, PA 15658
thedebterasers@aol.com
Attorney for Debtor(s)

Ronda J. Winnecour, Esquire
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
cmecf@chapter13trusteewdpa.com
Trustee

Parties Serviced via First Class Mail:

Lisa M Keyser
2608 Graham Avenue
Windber, PA 15963
Debtor(s)

/s/ Harry B. Reese, Esquire
POWERS, KIRN & ASSOCIATES, LLC
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Attorney for Movant
Dated: 07/03/2018